

COHEN & GREEN

September 26, 2022

Hon. Edgardo Ramos, U.S.D.J.
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 1000

By Electronic Filing.

Re: Sharma v. City of New York, Case No. 21-cv-10892 (ER)(BCM)

Dear Judge Ramos:

I am co-counsel for Plaintiff in the above-captioned matter. I write, jointly with Defendants regarding a deadline the Court set for joinder — as well as for certain attempts to identify a Jane Doe defendant. Per the Court's previous orders — which contemplated that discovery would be significantly further along than it is by now — Defendants were to identify Jane Doe 1 by June 13, 2022, and if they were unable to, Plaintiff was to attempt identification by conducting discovery and file any amendments September 26, 2022. *See* Dkt. No. 19.

Shortly thereafter, Defendants substituted their counsel. *See* Dkt. No. 25. Defendants did not identify Jane Doe 1 by June 13 — in part because they were in the process of substituting attorneys — but they have been engaged in diligent efforts to try to do so by September 26. However, because of the many obligations various attorneys involved have surrounding the raft of protest litigation, discovery has not moved as quickly as anyone would like. Thus, the parties jointly seek an extension of 45 days additional days, *nunc pro tunc*, for Defendants to identify Jane Doe 1 (making identification due on November 10, 2022), and 45 days thereafter for Plaintiff to attempt the same based on other discovery.

To accommodate that, and other discovery obligations, the parties also seek a corresponding extension of 90 days of all other discovery deadlines. We thank the Court for its attention to this matter.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

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cc:



All relevant parties by ECF.